

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE:	:	
Melissa M. Caldwell	:	
	:	Chapter 13
Debtor	:	
	:	Case No. 1:22-01455-HWV
	:	
U.S. Bank National Association as	:	
Trustee, in trust on behalf of J.P. Morgan	:	
Mortgage Acquisition Trust 2006-CW 2	:	
	:	
Movant	:	
	:	Answer to
v.	:	Motion for Relief from Stay
	:	
Melissa M. Caldwell	:	
and	:	
Jack N. Zaharopoulos, Trustee,	:	
Respondents	:	

DEBTOR'S REPLY TO MOTION
OF U.S. BANK NATIONAL ASSOCIATION
FOR RELIEF FROM THE AUTOMATIC STAY

AND NOW, this 20th day of April, 2023, comes the respondent, Melissa M. Caldwell, by and through her counsel, the CGA Law Firm, E. Haley Rohrbaugh, Esquire, and does file the within response averring that:

1. Admitted.
2. Admitted.
3. Admitted.
4. The document speaks for itself.
5. Admitted.
6. Admitted.
7. Denied. The Debtor is unaware of the total payoff on the mortgage.

8. It is admitted that the Debtor has failed to make certain post-petition mortgage payments because of some financial difficulties. However, the Debtor has informed Counsel that has applied for Pennsylvania Homeowners Assistance Fund with the Pennsylvania Housing Finance Agency.
9. Denied. The Debtor is unaware of amount needed to reinstate loan.
10. Denied. The Movant is not entitled to relief from the automatic stay.
11. Denied. Debtor is without knowledge as to whether, and to the extent which, Movant has incurred legal expenses.
12. Denied. Paragraph 12 is a conclusion of law to which no response is required.

WHEREFORE, it is requested that the relief sought by U.S. Bank National Association, be denied.

Respectfully submitted,
CGA Law Firm

/s/E. Haley Rohrbaugh, Esquire
E. Haley Rohrbaugh, Esquire
Sup. Ct. I.D. No. 323803
Counsel for Debtors
135 North George Street
York, PA 17401
(717) 848-4900

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CERTIFICATE OF SERVICE

I hereby certify that on April 20, 2023, service upon all interested parties indicated below was made by sending a true and correct copy of the Answer to Motion for Relief, by ECF and/or regular US Mail, postage prepaid, upon:

Jack N. Zaharopoulos
Standing Chapter 13 Trustee

Denise Carlon, Esquire
KML Law Group, P.C.
701 Market Street , Suite 5000
Philadelphia, PA 19106

/s/E. Haley Rohrbaugh, Esquire
E. Haley Rohrbaugh, Esquire